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**Via Electronic Mail Delivery**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-B204  
Washington, D.C. 20554

Re: *Ex Parte* Presentation  
Year 2000 Biennial Regulatory Review - WT Docket No. 01-108

Dear Ms. Salas:

This letter serves as notification that on this date Luisa Lancetti and Roger Sherman (representing Sprint PCS), had a meeting with Susan Singer, Roger Noel, Linda Chang, Jay Jackson, Jr., Bill Stafford and David Furth (of the Wireless Telecommunications Bureau) to discuss the above-captioned proceeding. A copy of the presentation material discussed at the meeting is attached hereto.

Pursuant to Section 1.1206(a), an original and one copy of this letter are being filed with your office. Please associate this letter with the files in the above-captioned proceeding.

Please contact us should you have questions concerning the foregoing.

Sincerely,



Luisa L. Lancetti

**Attachment**

cc: Susan Singer  
Roger Noel  
Linda Chang  
Jay Jackson, Jr.  
Bill Stafford  
David Furth

**Year 2000 Biennial Review**  
**Elimination of AMPS Standard**  
(WT Docket No. 01-108)

**Because of its Critical and Established Public Interest Benefits, the AMPS Standard  
Should Be Phased Out as Part of a National Transition Plan**

Sprint PCS  
*Ex Parte* Presentation  
January 14, 2001

## **AMPS Remains the Glue that Holds Wireless Networks Together**

- ◆ Congress has found that the “operation of seamless, ubiquitous, and reliable wireless telecommunications systems promote public safety and provide immediate and critical communications links among members of the public.” Wireless Communications & Public Safety Act of 1999, Pub. L. No. 106-81, § 2(a)(6).
- ◆ AMPS remains the predominant interface for roaming, both because of its ubiquitous coverage and because of incompatible 2G interfaces:

U.S. Geographic Coverage (Sixth Report, App. C, Table 7)

AMPS	95%	iDEN	27%
TDMA	42%	GSM	22%
CDMA	35%		

- ◆ Without AMPS, consumers will be unable to make emergency 911 calls if in an area where their particular 2G handset is not supported.
- ◆ The deaf and hard of hearing remain dependent on AMPS.
- ◆ Telematics and tracking systems rely on AMPS.

**41.8 million Americans – 38% of all mobile customers – used AMPS at the end of 2000**  
(Sixth Report data)

## **There Is Broad Consensus That a Transition Plan Is Needed**

♦ Eliminate AMPS rule immediately:

AT&T Wireless

Cingular

Ericsson

♦ Most parties favor a transition period before the AMPS rule is eliminated:

Verizon Wireless  
CTIA  
Rural Cellular Ass'n  
Rural Telecom. Group  
Sprint PCS  
CenturyTel Wireless  
U.S. Cellular  
Mid-Missouri Cellular  
Qwest Wireless

AARP  
Telecom. for the Deaf  
Self Help for Hard of Hearing  
Council of Organizational Representatives  
National Ass'n of the Deaf  
AG Bell Ass'n for the Deaf  
League for the Hard of Hearing  
Wireless Consumers Alliance  
Numerous individual consumers

OnStar Corp.  
ATX Technologies  
Mercedes-Benz  
CaseNewHolland  
Deere & Company  
EDS Corp.  
Independent Cellular Ass'n  
Numerous small cellular carriers

## **The Arguments in Favor of Immediate Repeal Lack Merit**

- ◆ FCC should rely on market forces (Cingular):

But the business needs of a particular incumbent carrier may not coincide with the needs of AMPS dependent customers – including 911 emergency callers, the hard of hearing, roamers and telematics service providers.

- ◆ Repeal would free up spectrum for other services (Cingular):

But Verizon Wireless has documented that AMPS repeal “will not free up a significant amount of spectrum for other uses” and will “not have a significant effect on the availability of spectrum in the markets where additional spectrum is needed most.”

There is no proof in the record that continued provision of AMPS is a burden on cellular network operations.

- ◆ AMPS rule discourages new entrant network buildout (AWS and Cingular):

New entrants like Sprint PCS have had only six years to buildout their networks (vs. 17 years for cellular carriers). Based on available data, Sprint PCS installed more cell sites during its first five years than the entire cellular industry installed in its first 10 years. (Entire industry: 14,740/Sprint PCS 15,227 )

PCS licensees also face challenges that cellular carriers never faced. It currently takes almost 20 months on average for Sprint PCS to construct a new cell site (including collocations) due to delays in the zoning approval process. In some areas it takes even longer.

PCS licensees do not need an incentive for continued network buildout, especially given the roaming prices charged by certain cellular carriers. They need time.

## **A National Transition Plan Is Necessary**

- ◆ Permitting each AMPS carrier to unilaterally determine when it will disable AMPS service would result in chaos – especially for roamers and 911 callers who will likely be unaware of AMPS has been disabled in certain areas. For same reason, service quality rule (*i.e.*, 22.901) should be maintained
- ◆ A national sunset date will facilitate the smooth transition from AMPS, because it will serve as the cornerstone for consumer education programs.

**An orderly, *national* transition is necessary, given the critical role that AMPS plays in today's market**

## **The Appropriate Sunset Date**

- ◆ Carriers favor a five-year sunset date so they have time to extend their digital networks before AMPS is disabled and because of the impacts on public service needs.
- ◆ Many consumers will likely need a five-year transition period:
  - It will take a year or two before the public learns of and understands the sunset date;
  - Customers and service providers dependent upon AMPS (e.g., OnStar) will need time to find suitable alternatives and to adjust to new environment;
  - Customers should not be required to discard AMPS equipment prematurely.
- ◆ Hard-of-hearing groups favor a longer transition:

TTY issue should be addressed by June 30, 2002. There is no immediate solution to the hearing aid/digital handset compatibility issue. (See Docket No. 01-309 comments filed Jan 11, 2002)
- ◆ Telematics providers seek an even longer transition, to 2011 (AMPS installed in new vehicles through 2003; average life of vehicles is eight years).

**Sprint PCS recommends the FCC establish a tentative sunset date five years from now because such a date will facilitate continued orderly AMPS migration.**

## **The Core Elements of a National Transition Plan**

- ◆ The most important step is for FCC to establish a national sunset date so carriers can begin preparing for transition and public interest groups can begin advising constituents.
- ◆ The FCC should retain the AMPS quality of service rule, Rule 22.901, to ensure that cellular carriers do not side-step the transition period by maintaining inadequate capacity to serve all AMPS customers.

Adoption of an AMPS sunset date without a corresponding quality of service standard would simply create a loophole whereby certain carriers could do indirectly (provide inadequate AMPS capacity and service) what they cannot do directly (close their AMPS networks altogether).  
(Sprint PCS Reply Comments at 11)

- ◆ FCC can monitor progress of AMPS migration in its annual CMRS competition reports or as part of its biennial review process.